

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

v.

THE PALESTINE LIBERATION
ORGANIZATION, *et al.*,

Defendants.

Civil Action No. 04cv397 (GBD) (RLE)

**DEFENDANTS' OBJECTIONS AND RESPONSES TO THE BLUTSTEIN, CARTER,
COULTER AND GRITZ PLAINTIFFS' SECOND REQUEST TO PRODUCE
DOCUMENTS AND THINGS**

Defendants The Palestine Liberation Organization ("PLO") and The Palestinian Authority ("PA") (collectively "Defendants"), by counsel, and pursuant to Rule 34 of the Federal Rules of Civil Procedure hereby respectfully submit their Objections and Responses to the Blutstein, Carter, Coulter and Gritz Plaintiffs' Second Request to Produce Documents and Things and state as follows:

PRELIMINARY STATEMENT

1. The objections and responses by Defendants to the Requests are based only upon such information and documents as are currently known to Defendants. These objections and responses are made subject to, without prejudice to, and are not in waiver of, Defendants' right to rely on other facts or documents at trial or to supplement their objections and responses hereto.

2. The exact wording of any objections or responses contained herein may be that of Defendants' counsel and does not necessarily purport to be that of Defendants.

Barghouti.

e. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the PSS.

f. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the GIS.

g. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the NSF.

h. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the MI.

i. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of Force 17.

j. All documents concerning Marwan Barghouti in the paper, computerized, electronic or other files or archives of the PAP.

OBJECTIONS:

Defendants hereby incorporate by reference, as if fully set forth herein, the foregoing General Objections. In addition, Defendants specifically object to Request No. 12 on the grounds that: (a) the Request is overly broad and unduly burdensome particularly with respect to its more than 10-year timeframe and the lack of any reasonable restrictions as to the scope of information it requests (e.g., its request for “all documents concerning Marwan Barghouti”); (b) the Request seeks production of documents that are irrelevant to any party’s claims or defenses and the Request is not reasonably calculated to lead to the discovery of admissible evidence; (c) the words and phrases “evidence,” “positions,” “jobs,” “work,” “employment,” “performed,” “titles, nature, purposes, responsibilities and duties,” and “rank or ranks” are vague and ambiguous and fail to describe the information or documents sought with sufficient particularity to allow for a meaningful response by Defendants; and (d) that, as potentially construed, the Request seeks documents protected by the attorney-client privilege, the work-product doctrine, the state secrets privilege, the law enforcement privilege and other applicable privileges or protections.

meaningful response by Defendants; and (d) that, as potentially construed, the Request seeks documents protected by the attorney-client privilege, the work-product doctrine, the state secrets privilege, the law enforcement privilege and other applicable privileges or protections.

RESPONSE:

Subject to and without waiving the foregoing General and Specific Objections, and without prejudice to Defendants' right to modify, amend, or supplement their responses as appropriate, Defendants are producing documents bearing Bates numbers 02:008988-90 which may be responsive to some subsections of this request. As to other subsections, Defendants state that based on an investigation conducted to date of information and files reasonably available to Defendants, Defendants have been unable to identify relevant, non-privileged documents or things within their possession, custody, or control that are responsive to a reasonable interpretation and scope of those subsections of this Request in the context of the allegations, claims, and defenses in this action.

December 21, 2012

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 21st day of December 2012, a true and genuine copy of the foregoing was served by certified mail on the following:

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